



U.S. Department of Justice
United States Attorney
District of New Jersey

970 Broad Street
Newark, New Jersey 07102

973-645-2700

March 5, 2025

VIA CM/ECF

Honorable Michael E. Farbiarz
United States District Judge
U.S. Post Office & Federal Courthouse
Newark, New Jersey 07102

Re: United States v. Gordon Coburn and Steven Schwartz
Crim. No. 19-120 (MEF)

Dear Judge Farbiarz:

The Government respectfully submits this letter pursuant to the Court's March 5, 2025 order directing the parties to list outstanding motions that may have stopped the clock under the Speedy Trial Act. (ECF No. 965). The Government continues to believe that the only motion currently pending that has stopped the clock under the Speedy Trial Act is the one before Magistrate Judge Hammer in which the Government and Debevoise & Plimpton have sought a ruling on privilege issues relating to some of the Government's anticipated cross-examination.¹

Respectfully submitted,

GLENN S. LEON
Chief

JOHN GIORDANO
United States Attorney

/s/ Keith D. Edelman
/s/ Connor Mullin
/s/ Paul G. Ream

/s/ Rachelle M. Navarro

KEITH D. EDELMAN
CONNOR MULLIN
PAUL G. REAM
Fraud Section, Criminal Division
U.S. Department of Justice

RACHELLE M. NAVARRO
Assistant United States Attorney
District of New Jersey

¹ Although it is not currently pending, the Government does anticipate tomorrow filing a motion to admit certain evidence relating to the bribe scheme involving Cognizant's campus in Pune, India, pursuant to the deadline previously set by the Court. See ECF No. 928. The Government's position is that, once filed, that motion will be pending as well and will toll the Speedy Trial clock.